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**From:** Tyler Nickerson [*personal contact information removed by EPA*]  
**Sent:** Wednesday, July 15, 2009 11:48 PM  
**To:** WaterCoolers@energystar.gov  
**Cc:** [*personal contact information removed by EPA*]  
**Subject:** Water Coolers Specification Revision

Dear Steve Ryan,

Regarding the email notice in request for comments and feedback concerning the Version 1.1 ENERGY STAR specification for Water Coolers, Crystal Mountain is extremely interested in participating moving forward.

It is clear that the definition of “the bottle-less water coolers” can be understood to include a wide range of products sold in the market (ie. POU Conversion Systems, Under-sink pressure type units, variety of wall and floor standing fountain style units, etc). This does need to be clarified. In consideration of product definitions, I would like to see the definitions be consistent with both UL and IEC definitions used.

Following your format in the Expected Scope of Revision, I’ve the following initial feedback.

Expansion of Qualified Product Types: Is the intention to create different standards based on multiple performance outputs of different products?

We do have recommendations concerning changes to the existing 1.1 version of the testing specifications, which will be provided in the next couple of days.

Reconsideration of Standby-only Testing: Currently, we do not supply or manufacture water treatment product, however we would be very interested in reviewing the methods and data being submitted for reference to create a proposed standard for this.

Requirement for Testing as Shipped: Agreed, through industry experience, we recognize that product should not just meet the required standards, but also be provided to the market with the same criteria.

Crystal Mountain has been manufacturing and distributing product to this industry for almost 20 years globally. Our in house life and reliability test facilities include 5 separate testing labs whereby we are able to control

Ambient (10-40°C +/-1°C)  
Humidity (90% +/-2%)  
Air Flow (<0.25 m/sec)  
Power Input Voltage and Frequency

In addition to this, the above listed rooms have the capability to monitor the test units via computerized data recorders, as well as monitoring of the voltage and current parameters (including power consumption to a resolution of 0.1Watt)

In addition to this we have certified noise testing chambers and a multitude of other life test and reliability stations related to manufacturing our product line.

Please let us know how or what further information I can provide, to support this directive needed to benefit both the industry and consumers.

I've included in my reply both our General Manager, Wes Fraser, as well as our Life Test and Reliability Manager, Denzel Zhou, in this reply for your reference, as we had an internal discussion of this issue earlier this week.

Sincerely,

**Tyler Nickerson**

*Manager, Production Engineering Department*

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